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**From:** Subramaniam, Ravi [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E738F9D27062486E9047184B867FD968-SUBRAMANIAM, RAVI]  
**Sent:** 1/20/2015 3:00:26 PM  
**To:** tbstarr@mindspring.com  
**Subject:** RE: some loose ends on formaldehyde

Tom:

Yes, I have been extremely busy with my new management position. It has been a while so I need to set aside some time to see where the discrepancy comes from. I have it on my task list for today. I will try to call you tomorrow.

--Ravi.

Acting Branch Chief, Quantitative Risk Methods Group, NCEA-Washington, ORD, EPA  
Potomac Yard North N7761, Arlington, VA. (703) 347-8606, (571) 305-3601 (m)

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**From:** tbstarr@mindspring.com [mailto:tbstarr@mindspring.com]  
**Sent:** Tuesday, January 20, 2015 9:41 AM  
**To:** Subramaniam, Ravi  
**Subject:** Fwd: some loose ends on formaldehyde

Ravi:

Any progress on resolving the discrepancies I noted in my previous 12/26/2014 email re formaldehyde tumor data (see below)? I know you are very busy, but I was hoping to complete a report on use of the DNA adduct data for risk assessment in combination with the rat nasal tumor data, and I need an answer re the correct background nasal tumor incidence. Please call me (919/876-0203) if you have any questions. Thanks very much in advance.

Best regards,  
Tom Starr

TBS Associates  
7500 Rainwater Road  
Raleigh NC 27615-3700 USA  
919/876-0203  
[tbstarr@mindspring.com](mailto:tbstarr@mindspring.com)

----- Forwarded Message -----

**Subject:** some loose ends on formaldehyde  
**Date:** Fri, 26 Dec 2014 19:21:26 -0500  
**From:** [tbstarr@mindspring.com](mailto:tbstarr@mindspring.com)  
**To:** subramaniam, Ravi <[Subramaniam.Ravi@epa.gov](mailto:Subramaniam.Ravi@epa.gov)>

Ravi:

I was doing some additional formaldehyde risk calculations for rats recently, and noticed a couple of discrepancies in a write-up that you sent to me way back in 2012, 11/5/2012 to be exact. They pertain to the background squamous cell carcinoma incidence that you used in your model

fitting and subsequent calculations.

In the table in your 11/5/2012 writeup, background nasal cancer incidence is listed as 1/3602, but it is also listed as 0.0008. However, both of these numbers, which are not equal, appear to me to be incorrect.

First,  $1/3602 = 2.78e-4$ , not 0.0008. Second, your 2007 Risk Analysis 27(5):1237-1254 paper lists the background squamous cell carcinoma incidence as  $1/4602 = 0.02\%$  or 0.0002. I presume the latter number (1/4602) is the correct one. Can you please confirm this via return email at your earliest convenience? Thanks very much.

Best regards and happy holidays,  
Tom Starr

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